IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DARCY J. PATERSON, individually and on behalf of all others similarly situated,)
Plaintiff,)) CIVIL ACTION NO. 2:16-cv-06626-ER
v.)
CHEMTURA CORPORATION, INC., CRAIG A. ROGERSON, JEFFREY D. BENJAMIN, TIMOTHY J. BERNLOHR, ANNA C. CATALANO, JAMES W. CROWNOVER, ROBERT A. DOVER, JONATHAN F. FOSTER, and JOHN K. WULFF,))))))))
Defendants.)

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE PLAINTIFF'S COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

WHEREAS, on February 17, 2017, the Court issued an Order Concerning Plaintiff's Voluntary Dismissal of the Above Action with Prejudice as to Plaintiff only and Plaintiff's Counsel's Anticipated Application for an award of Attorneys' Fees and Expenses (Docket No. 17) (the "Order"), which, among other things, dismissed the above action and retained jurisdiction over the parties for the purpose of entering Plaintiff Chemtura Corporation's ("Chemtura" or the "Company") petition for an award of attorneys' fees and expenses (the "Fee and Expense Petition");

WHEREAS, pursuant to the Order, Chemtura's Opening Brief in support of the Fee and Expense Petition and any supporting papers was originally due on March 7, 2017;

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WHEREAS, pursuant to the Order, Defendants' Opposition to the Fee and Expense

Petition and any supporting papers was originally due on April 4, 2017;

WHEREAS, pursuant to the Order, Chemtura's Reply Brief in further support of the Fee

and Expense Petition and any supporting papers was originally due on April 18, 2017; and

WHEREAS, the parties have conferred regarding the schedule governing the Fee and

Expense Application;

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their

undersigned counsel, subject to the approval of the Court, that the following schedule shall

govern the briefing on the Fee and Expense Petition:

1. Plaintiff shall file and serve his Opening Brief in support of the Fee and

Expense Petition and any supporting papers by no later than March 21,

2017.

2. Defendants shall file and serve any opposition to the Fee and Expense

Petition and any supporting papers by no later than April 18, 2017.

3. Plaintiff shall file and serve his Reply Brief in further support of the Fee

and Expense Petition and any supporting papers by no later than May 2,

2017.

IT IS SO STIPULATED.

Dated: March 7, 2017

/s/ Kenneth I. Trujillo

Kenneth I.Trujillo Matthew S. Olesh

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Local Counsel for Plaintiff Paterson

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Attorneys for Defendants Chemtura, Craig A. Rogerson, Jeffrey D. Benjamin, Timothy J. Bernlohr, Anna C. Catalano, James W. Crownover, Robert A. Dover, Jonathan F. Foster, and John K. Wulff

SO ORDERED this

day of WW, 20

Honorable Eduardo C. Robreno United States District Court Judge